

JOHN RAY VELLA,

Plaintiff,

V.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:15-cv-01560-APG-GWF

COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Marla Letellier, Special Assistant United States Attorney, to request that this Court extend the time to respond to Plaintiff's Motion for Remand, which was filed on November 18, 2015, by 15 days from January 20, 2015 to February 4, 2016. This is Defendant's second request for an extension of time to respond to Plaintiff's Motion. Counsel for Defendant contacted Plaintiff's counsel on January 19, 2016, and Plaintiff's counsel responded on January 19, 2016 that he does not oppose Defendant's motion. Defendants' current deadline is January 20, 2016.

1 The instant request is not intended to cause delay and is necessary because of the heavy
2 workload of counsel for Defendant, and to allow the parties additional time to pursue potential
3 settlement of this matter.

4 It is therefore respectfully requested that Defendant be granted a fifteen (15) day extension of
5 time to respond to Plaintiff's motion, up to and including February 4, 2016.

6 Dated: January 20, 2016.

7 Respectfully submitted

8 DANIEL G. BOGDEN
9 United States Attorney

10 /s/ Marla K. Letellier
11 MARLA K. LETELLIER
Special Assistant United States Attorney

12 OF COUNSEL:

13 DEBORAH STACHEL
14 Acting Regional Chief Counsel
15

16 IT IS SO ORDERED:

17 George Foley Jr.
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: January 21, 2016
20 _____
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I, Marla Letellier, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service, identified below:

CM/ECF:

David M. Moore, Esq.
Edward M. Bernstein & Associates
500 S. Fourth St.
Las Vegas, NV 89101
Email: dmoore@edbernstein.com

Dated this 20th day of January, 2016

/s/ Marla K. Letellier
MARLA K. LETELLIER
Assistant United States Attorney